C9
Conc.

224. (New) The network of claim 215 wherein each document imaging device has a compact, desktop configuration.

225. (New) The network of claim 215 wherein each document imaging device further includes means for dispensing currency at customer request, the device outputting a dispensed monetary value indication over the data communications network where the accounting system updates the financial account in view of the dispensed monetary value indication.

REMARKS

Claims 78-82 and 212 have been canceled. New claims 215-225 have been added. Thus, claims 41-77 and 213-225 are now pending in the application. Reconsideration of the application is respectfully requested.

The claims were rejected under the judicially created doctrine of obviousness-type double patenting as being unpatentable over claims in various recited combinations of patents and applications. Applicants request that response to this rejection be deferred until such time as the Examiner

indicates the presence of patentable subject matter. At that time, Applicants will either traverse the rejection based on the claimed patentable subject matter, or file the appropriate terminal disclaimer(s) to overcome the rejection.

Claims 41, 43-45, 50-51, 53-54, 78, 81-82, 212 and 214 were rejected under 35 U.S.C. 103(a) as being unpatentable over Dinan in view of Elischer. Claims 78, 81-82 and 212 have been canceled. With respect to the remaining claims, Applicants respectfully traverse.

Claims 41 and 51 have been amended to delete reference to "full" imaging and "video", as well as to delete reference to the controller. It is noted that Claims 41 and 51 specifically each recite that a multitude of "image processing units [are] communicatively coupled together to form a network." The claims go on to recite the elements and operational characteristics of each one of the networked image processing units.

The Examiner asserts that the Dinan reference teaches the claimed multitude of networked image processing units. No citation to a column/line reference within Dinan is provided by the Examiner in support of this assertion. Applicants

respectfully submit that the Examiner has read more into the Dinan reference than is actually present.

The Dinan reference teaches a document image processing system where a document imager communicates with a host data storage facility. Figure 1 of Dinan illustrates just a single document imager. A review of the Dinan reference disclosure further reveals no teaching or suggestion that multiple document imagers are connected together in a network configuration, as claimed. The Elischer reference does not address the "network" deficiencies of the Dinan reference.

Specific reference is now made to Claim 41. The Dinan reference further teaches that the document imager is an IBM 3890 type device modified to include video imaging in addition to microfilm. A brochure relating to the IBM 3890 family of devices is attached hereto as Exhibit A. A review of that brochure reveals that these IBM 3890 (and more specifically, the IBM 3897 image camera) devices are quite large in size. It is noted that Applicants have specifically claimed in claim 41 that each image processing unit is "compact." The IBM 3890/3897 document processors can hardly be characterized as "compact" in the ordinary meaning of that term, and further when considered

in the context of, for example, Figures 1o, 1s and 1t and the associated description from the patent application specification. The combined teachings of Dinan and Elischer thus fail to teach or suggest the claimed invention.

With further reference to claim 41, Applicants claim having each image processing unit function to automatically determine the authenticity of the documents. In support of the rejection, the Examiner asserts that Elischer teaches this claim limitation at col. 3, lines 57-65. This citation, however, does not support the Examiner's position. Elischer teaches at this location an automatic transaction balancing operation, not. a document authentication action, as claimed.

In view of the foregoing, Applicants respectfully submit that claims 41 and 51 are patentable over the cited prior art references.

Claims 47-48, 57-58 and 79-80 were rejected under 35 U.S.C. 103(a) as being unpatentable over Dinan in view of Elischer and Graves. Claims 42, 49, 52, 55-56 and 213 were rejected under 35 U.S.C. 103(a) as being unpatentable over Dinan in view of Elischer and Granzow. Each of these dependent claims is

believed to be patentable over the cited art for at least the reasons recited above with respect to claim 41 and 51.

With respect to claim 49, Applicants claim locating the image processing units at teller windows. In rejecting this claim, the Examiner cites to a teaching in Granzow for a document dispensing ATM (col. 3, lines 4-14). It is unclear to Applicants how this ATM teaching for a document dispenser is relevant to the claim which is directed to a multitude of teller window located image processing units connected in a network to an accounting system. An ATM is well understood in the art to not be the same as a teller window. There is no teaching in Granzow for image processing, and there is no teaching in Granzow for locating any processing devices, much less the claimed network connected image processing devices, at teller windows.
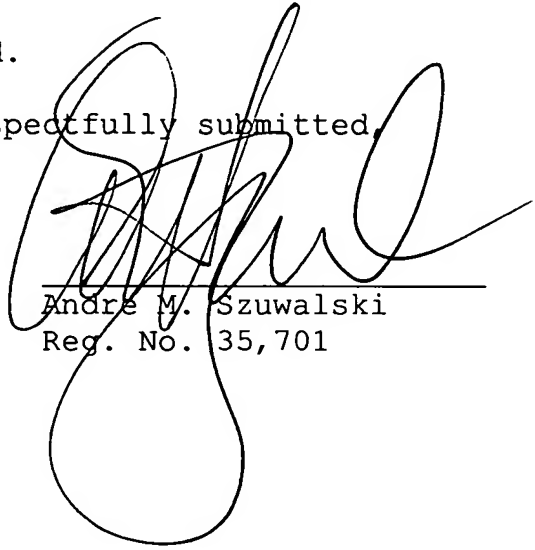
New claims 215-225 have been added. Claim 215 is directed to a networked connection of plural imaging devices and an accounting system which is neither disclosed nor suggested by the Dinan/Elischer combination. The dependent claims recite additional subject matter relating to the operation and

configuration of the claimed network which are similarly neither disclosed nor suggested by the cited art combination.

Allowance of the application in view of the foregoing remarks is respectfully requested.

Respectfully submitted,

By: _____
Andre M. Szuwalski
Reg. No. 35,701

JENKENS & GILCHRIST, P.C.
1445 Ross Avenue, Suite 3200
Dallas, Texas 75202
(214) 855-4795
(214) 855-4300 (fax)